

EXHIBIT 4

Jeffrey D. Isaacs, M.D.
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

DR JEFF ISAACS

Plaintiff,

vs.

GOOGLE LLC

Defendant.

Case No. **24-cv-80395-RLR**

NOTICE OF DEPOSITION

DISCOVERY

NOTICE OF DEPOSITION OF GOOGLE LLC PURSUANT TO RULE 30(b)(6)

To: Google LLC Legal Team

Date: August 12, 2024

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Dr Jeff Isaacs will take the deposition upon oral examination of the person(s) most knowledgeable and designated by Google LLC to testify on its behalf, amongst any and all Google salaried administrators, concerning the related issues detailed below.

MATTERS FOR EXAMINATION

1. The November 2022 changes (hereby referred to as “effective termination”) of the reverse phone search listings of OkCaller.com directory pages in Google SERPs.
2. Google LLC's investigation into the effective termination of OkCaller.com.
3. The decision-making process and changes in Google’s search algorithm that affected OkCaller.com over the past 5 years, and with specific focus on November 2022.
4. Google’s correspondence and communications with Dr. Jeff Isaacs regarding his status as a “trusted partner.”
5. Google’s assessment of alleged patent infringements related to Dr. Isaacs’ patent (RE48847) by competitors.
6. Google’s interactions and agreements with Apple Inc. that could have impacted OkCaller.com.

7. Google's policies regarding evidence preservation, auto-deletion, and retention relevant to OkCaller.com. Specifically to include, whether the auto-delete issues that plagued the DOJ case against Google impact ESI related to this case.
8. Google's rankings and organic referral to reverse phone search sites over the past 8 years, including rankings and methodologies of the top ten reverse lookup sites.
9. Any knowledge Google had, or its attorneys had, of Isaacs' litigation history, including antitrust witness activity protected under federal law, up through and including November 2022
10. Any and all other matters documented in the January 2024 subpoenas issued by Attorney Keith Mathews to Google regarding OkCaller, as part of the "Keller Williams" lawsuit.

DATE AND LOCATION OF DEPOSITION

11. The deposition will take place on August 28, 2024 at 1PM, at Mandarin Brickell Hotel in Miami, Florida, or at another mutually agreed-upon location. If an alternative location is preferred or if you wish to conduct the deposition remotely, please notify the undersigned immediately so that suitable arrangements can be made.

METHOD OF RECORDING

12. The deposition will be recorded by stenographic means and may also be videotaped.

FAILURE TO APPEAR

13. Failure to designate and produce the requested person(s) for deposition or to provide the requested documents may result in sanctions by the Court, including but not limited to the exclusion of evidence, the imposition of monetary sanctions, or other appropriate relief.

Issued on this 12th day of August 2024.



/s/ Jeffrey D. Isaacs

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2024, a true and correct copy of the foregoing Notice of Deposition of Google LLC Pursuant to Rule 30(b)(6) was served via email upon the following:

Google LLC Legal Team

A handwritten signature in black ink that reads "Jeffrey D. Isaacs". The signature is written in a cursive, flowing style.

/s/ Jeffrey D. Isaacs

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